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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 OAKLAND DIVISION

15 AFFINITY CREDIT UNION, GREENSTATE  
16 CREDIT UNION, and CONSUMERS CO-OP  
17 CREDIT UNION,

18 Plaintiff,

19 v.

20 APPLE INC., a California corporation,

21 Defendant.

Case No. 4:22-CV-04174-JSW

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO CONTINUE THE  
DEADLINE TO TAKE THE  
DEPOSITION OF NON-PARTY  
GOOGLE LLC AND TO BRING  
ANY MOTION TO COMPEL  
RELATED TO THE DEPOSITION  
OF NON-PARTY GOOGLE LLC**

JUDGE: The Honorable Jeffrey S.  
White

**STIPULATION**

Pursuant to Local Rule 6-2, Plaintiffs Affinity Credit Union, Greenstate Credit Union, and Consumers Credit Union (“Plaintiffs”) and Defendant Apple Inc. (“Apple”) (collectively, the “Parties”), by and through their respective attorneys of record, hereby stipulate as follows:

WHEREAS, on May 13, 2025, the Court entered an order setting October 15, 2025, as the fact discovery deadline (ECF No. 136);

WHEREAS, pursuant to Local Rule 37-3 and absent stipulation otherwise, the deadline to bring any motion to compel related to fact discovery was October 22, 2025;

WHEREAS, Plaintiffs served a Rule 45 and 30(b)(6) deposition notice on non-party Google LLC (“Google”) on June 9, 2025;

WHEREAS, Plaintiffs served an amended Rule 45 and 30(b)(6) deposition notice on Google on July 3, 2025;

WHEREAS, Apple served a Rule 45 and Rule 30(b)(6) deposition notice on Google on July 9, 2025;

WHEREAS, Apple served an amended Rule 45 and Rule 30(b)(6) deposition notice on Google on August 8, 2025;

WHEREAS, Apple served an amended Rule 45 and Rule 30(b)(6) deposition notice on Google on September 4, 2025;

WHEREAS, counsel for the Parties and Google have engaged in good faith meet and confer efforts regarding the topics for the deposition;

WHEREAS, the Court previously entered an order continuing the deadline for the Google deposition until October 31, 2025, and the deadline to bring a motion to compel until two weeks after the completion of the deposition (ECF No. 238);

WHEREAS, the Court previously entered an order continuing the deadline for the Google deposition until November 21, 2025, and the deadline to bring a motion to compel until December 12, 2025 (ECF No. 288);

1 WHEREAS, counsel for the Parties and for Google have continued to engage in good  
2 faith meet and confer efforts regarding the topics for the deposition and to determine a suitable  
3 date for the deposition in light of the availability of counsel and the Rule 30(b)(6) witness;

4 WHEREAS, counsel for Plaintiffs and Apple have agreed to conduct the deposition of  
5 Google on December 10, 2025;

6 WHEREAS, counsel for Plaintiffs and Apple have agreed to continue the deadline to  
7 bring any motion to compel as to the Google deposition until January 7, 2025;

8 WHEREAS, continuing the deadlines to take the Google deposition and to file a motion  
9 to compel as to that deposition will not affect other dates currently scheduled in this matter;

10 WHEREAS the parties have previously stipulated to and/or the Court has previously  
11 ordered the following time modifications: to extend Apple's time to respond to the complaint  
12 (ECF No. 15); to set a briefing scheduling for Apple's motion to dismiss the amended complaint  
13 (ECF No. 42); to extend Apple's time to answer the amended complaint (ECF No. 65); to amend  
14 the case schedule (ECF No. 79); to modify the case schedule (ECF No. 136); to extend Google's  
15 and Plaintiffs' time to respond to prior Apple administrative motions to seal (ECF Nos. 158 &  
16 175); to modify the hearing date for Plaintiffs' motion for class certification (ECF No. 194); to  
17 extend the deadline to depose Google and the deadline to bring a motion to compel as to the  
18 Google deposition (ECF No. 238); to extend the deadline to file certain motions to compel  
19 related to fact discovery (ECF No. 282); to continue the deadline for the Google deposition and  
20 the deadline to bring a motion to compel related to that deposition (ECF No. 288); and to extend  
21 the deadline to file motions to compel directly related to depositions that occurred on October 16  
22 and 17, 2025 (ECF No. 291);

23 The Parties hereby stipulate that the date for Plaintiffs and Apple to take the deposition of  
24 Google is set for December 10, 2025, and the deadline to bring any motion to compel as to that  
25 deposition is continued until January 7, 2025.

1 Dated: November 21, 2025

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*Attorneys for Defendant Apple Inc.*

12 Dated: November 21, 2025

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**~~PROPOSED~~ ORDER**

Having considered the Parties' Stipulation, it is hereby Ordered that:

The deposition of Google is set for December 10, 2025, and the deadline to bring any motion to compel as to that deposition is January 7, 2025.

Dated: November 21, 2025

By: \_\_\_\_\_

  
THE HONORABLE JEFFREY S. WHITE  
United States District Judge